

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

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Retail Access Optimization Initiative

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Docket No. N2011-1

INTERROGATORIES OF THE  
AMERICAN POSTAL WORKERS UNION, AFL-CIO  
TO USPS WITNESS BOLDT  
APWU/USPS-T1-1-5  
(August 15, 2011)

Pursuant to Rules 25 through 28 of the Rules of Practice, American Postal Workers Union, AFL-CIO directs the following interrogatories to United States Postal Service witness James J. Boldt (USPS-T-1). If the witness is unable to respond to any interrogatory, APWU requests that a response be provided by an appropriate person capable of providing an answer.

As used in these interrogatories, the terms listed below are defined as follows:

The term "document" means all writings of any kind, including the originals and all copies, whether different from the originals by reason of any notations made on such copies or otherwise (including without limitation correspondence, memoranda, notes, diaries, statistics, letters, telegrams, minutes, contracts, reports, studies, summaries, pamphlets, books, interoffice and intraoffice communications, offers, notations of any sort of conversations such as telephone calls, meetings or other communications, bulletins, computer printouts, teletypes, telefaxes, worksheets, and all drafts, alterations, modifications changes and amendments of any kind to the foregoing); graphic or oral records or representations of any kind (including without limitation photographs, charts, graphs, microfiche, microfilm, videotape recordings, motion pictures); and electronic, mechanical or electrical records or representations of any kind (including without limitation e-mails, computer files, tapes, cassettes, discs, recordings).

The term "all documents" means every document as above defined known to

USPS and every such document which can be located or discovered by reasonably diligent efforts.

The term "Postal Service" includes all agents, employees, attorneys, representatives, and anyone acting on its behalf, as well as the Board of Governors, contractors and subcontractors to the Postal Service, and the Postal Service Office of Inspector General (OIG).

The term "person" means any natural person, corporation, partnership, proprietorship, association, organization or group of natural individuals.

The term "identify," when used with regard to a person means to provide the full name, position, address and telephone number of the person.

The term "identify," when used with regard to a document means to describe the subject matter of the document, its author, its date and any addressee.

For each interrogatory response, identify all individuals responsible for providing the response who will be able to confirm the response under oath.

For any objection to or other refusal to answer any portion of any interrogatory, provide all information requested by that portion of the request to which there is no objection, or which an answer is not refused. If an objection is made to an interrogatory on the ground that it is too broad, provide all information determined by USPS to be discoverable. If an objection is made to an interrogatory on the ground that to provide the requested discovery would constitute an undue burden, provide all requested documents that can be supplied without undertaking what is claimed an undue burden.

For those portions of any interrogatory to which an objection is raised, or which a complete answer is otherwise refused, state each reason for the objection or declination. If an objection is made to any portion of any interrogatory on the ground that it seeks privileged or otherwise non-discoverable information, state the privilege or other protection asserted, identify all persons to whom the document that is claimed to be non-discoverable have been communicated or displayed, and identify all documents that constitute, contain or reflect such information; and provide a separate list of all asserted privileged documents that identifies the author, recipient date and general subject matter of each document.

In any instance where a response to an interrogatory cannot be provided in full, so state and then respond to that portion of the interrogatory to which USPS can respond.

You should supplement the responses to answers to these interrogatories in accordance with the provisions of Rule 26(e) of the Federal Rules of Civil Procedure.

Respectfully submitted,

Darryl J. Anderson  
Jennifer L. Wood  
Counsel for American Postal Workers Union, AFL-CIO

**APWU/USPS-T1-1** Please refer to Library Reference USPS-LR-N2011-1/2. For each facility listed in this Library Reference please provide:

- a.) the hours of operation;
- b) the facility finance number and corresponding main office finance number, e.g., the finance number assigned to a station and the corresponding finance number for the main post office to which the station reports;
- c) the street address for each office;
- d) the type (post office, CPU, approved shipper, stamps on consignment, etc.) and hours of operation of each of the “five postal retail and/or alternate access sites” of each facility listed in this Library Reference; and
- e) the driving distance and driving time between each facility listed in this Library Reference and its corresponding five “postal retail and/or alternate access sites.”

**APWU/USPS-T1-2** For each retail facility not selected for study under ROA please provide:

- a) the hours of operation;
- b) both the facility finance number and corresponding main office finance number, e.g., the finance number assigned to a station and the corresponding finance number for the main post office to which the station reports;
- c) the street address; and
- d) the revenue and expenses.

**APWU/USPS-T1-3** Please refer to Page 4, Lines 1-8 of your testimony. Were all of the “alternate access channels” listed in your testimony, including those that only sell postage stamps, considered as “alternate access sites” when determining if a facility qualified for discontinuance review? If not, identify which types of “alternate access sites” were considered when identifying the postal retail facilities for discontinuance review.

**APWU/USPS-T1-4** Describe the standard types of products and service available in each type of alternative access sites. Where the range of products and services vary with a type, please describe the range of variability.

**APWU/USPS-T1-5** On Page 12, Lines 3-5 of your testimony you state: “given changes in many communities, it is likely that these customers already travel outside their local community to purchase other goods and services and conduct other activities of daily living.” Please provide a copy of all studies or other documentation and information you relied upon in coming to this conclusion.